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June 24, 2024

Via ECF

The Honorable Arun Subramanian
United States District Court
Southern District of New York
500 Pearl Street, Courtroom 15A
New York, New York 10007

Re: Fletcher et al. v. Niang, et al., Case No. 24-cv-01913 (AS)

Dear Judge Subramanian:

On June 6, 2024, Defendants Abdoulaye Niang, Alexander Niang, Mewza LLC and Abarika LLC (the “Niang Defendants”) requested an extension of time to re-file their renewed motions to dismiss and to transfer venue on or before June 24, 2024 (Dkt. 48). We write on behalf of both parties, with the Niang Defendants’ consent, to request a stay of proceedings, adjournment of all pending deadlines, and the issuance of a permanent injunction (Dkt. 51).

The attorneys for the Parties herein have reached an agreement to settle the trademark infringement claims (Dkt. 50) against the Niang Defendants, and as a result, Plaintiffs filed a proposed order for permanent injunction (Dkt. 51). Given the foregoing, the Parties respectfully request a stay of the copyright claims asserted in the above-referenced action pending resolution of the lawsuit in Georgia (*Abdoulaye Niang as parent of Alexander Niang v. PhatMojo, LLC and Roy & Charcle, LLC*, Civil Action No. 1:23-05446-SEG). The parties are prepared to update the Court on the status of proceedings in the Georgia action as necessary.

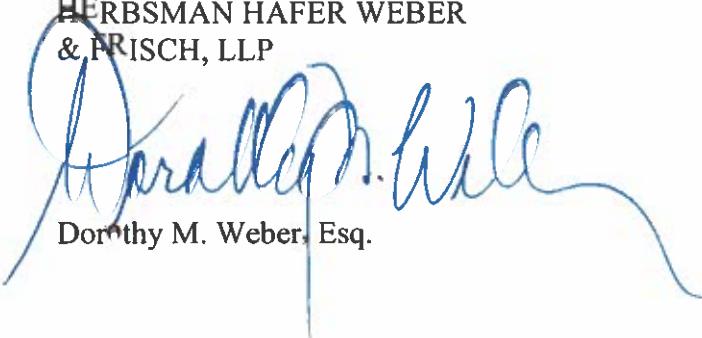
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This is the Parties' first request for a stay and adjournment. We appreciate your consideration of this request.

Respectfully submitted,

HERBSMAN HAFER WEBER
& FRISCH, LLP



Dorothy M. Weber, Esq.

DMW/rr

cc: Mark H. Bloomberg, Esq. (Via ECF)
James W. Hawkins, Esq. (Via ECF)

Application GRANTED. The parties should provide the Court an update regarding the status of the Georgia case every 90 days and within 10 days of the Georgia case being resolved.

The Clerk of Court is directed to terminate the motion at ECF No. 52 and stay this matter.

SO ORDERED.



Arun Subramanian, U.S.D.J.
Date: July 1, 2024